

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
THOMAS N KOUNAS	:	
aka Thomas Nick Kounas	:	CASE NO. 1:17-bk-02473
Debtor	:	
	:	
M&T BANK MORTGAGE	:	
Movant	:	
	:	
THOMAS N KOUNAS	:	
aka Thomas Nick Kounas	:	
Respondent	:	
	:	
	:	
	:	
	:	

ANSWER TO MOTION FOR RELIEF FROM STAY

1. Admitted.
2. Admitted.
3. Admitted.
4. This paragraph paraphrases portions of a documents, which are attached to the Motion and which speak for themselves; to the extent that this paraphrase conflicts with the actual wording or meaning of the documents, it is denied.
5. Admitted.
6. Admitted that the debtor has fallen behind on post petition payments; however, he intends to apply for a loan modification.
7. Admitted that the approximate amount is as stated.
8. The Debtor lacks knowledge or information sufficient to form a belief as to the truth of this averment, and therefore denies the same.
9. This paragraph is a conclusion of law to which no answer is necessary; to the extent that an answer is deemed necessary, it is denied.

WHEREFORE, the Debtor respectfully requests that this Court deny the motion for relief filed by the Movant and grant such other relief as this Court deems just.

Respectfully submitted,

/s/ Kara K. Gendron
Kara K. Gendron, Esquire
Attorney ID 87577
Mott & Gendron Law
125 State Street
Harrisburg, PA 17101
(717) 232-6650 TEL
(717) 232-0477 FAX
karagendron@gmail.com